

1 Bird & Van Dyke, Inc.
2 A Professional Law Corporation
3 David S. Van Dyke, CABN 154402
4 Mary Ann F. Bird, CABN 206770
5 3522 Deer Park Drive
6 Suite A
7 Stockton, CA 95219
8 Telephone 209.414.3266
9 Facsimile 209.414.3268
10 Attorneys for Defendant ENRIQUE NAVARRO VILLA

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

THE UNITED STATES OF AMERICA,
Plaintiff,
vs.
ENRIQUE NAVARRO VILLA,
Defendant.

Case No.: 2:23 CR 00113 DJC; 2:23 CR 00073
DJC

STIPULATION AND ORDER TO
CONTINUE JUDGMENT AND
SENTENCING HEARING

STIPULATION

Plaintiff, United States of America, by and through its counsel of record, Assistant United States Attorney Robert Abendroth, and the Defendant, by and through his counsel of record, Mary Ann F. Bird, hereby stipulate as follows:

1. On January 23, 2025, Defendant pled guilty to Count 3 of the Indictment under docket 2:23 CR 00113 and to Count 6 of the Indictment under docket 2:23 CR 00073. The matters was referred to the Probation Office for preparation of the pretrial investigation reports for both dockets. The matters are presently set for judgment and sentencing on August 14, 2025.

BIRD & VAN DYKE, INC.

STIPULATION AND PROPOSED ORDER RE: RESETTING OF JUDGMENT AND SENTENCING

PAGE: 1

1

2. Defense notified the Government of the need for additional time to gather, analyze and

3 present information relevant to the Court's consideration of the 18 U.S.C 3553(a) factors

4 before the imposition of sentence. Having considered defense counsel's request, the

5 Government has no opposition to the requested date. Similarly, US Probation also has no

6 opposition to this request.

7

8

9 3. Therefore, by this stipulation, defense respectfully requests that this Court continue the

10 judgment and sentencing hearing until November 6, 2025 at 10:00 AM.

11

12 4. All previous dates for the preparation of the Presentence Report, Objections and

13 Responses have been completed.

14

15

16 5. Because the Defendant has pled guilty, the provisions of the Speedy Trial Act do not

17 apply to this request.

18

19 IT IS SO STIPULATED.

Respectfully submitted,

20 Dated: August 5, 2025

KIMBERLY A. SANCHEZ
Acting United States Attorney

22 _____/s/ Robert Abendroth _____
23 ROBERT ABENDROTH
24 Assistant United States Attorney

25 Dated: August 5, 2025

26 _____/s/ Mary Ann F. Bird _____
27 MARY ANN F. BIRD
28 Attorney for ENRIQUE NAVARRO VILLA

BIRD & VAN DYKE, INC.

STIPULATION AND PROPOSED ORDER RE: RESETTING OF JUDGMENT AND SENTENCING

PAGE: 2

FINDINGS AND ORDERS

The Court hereby continues the judgment and sentencing hearing to November 6, 2025 at 9:00 AM.

IT IS SO ORDERED.

Dated: August 6, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE